



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I-NEW ENGLAND  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MASSACHUSETTS 02109-3912

**URGENT MATTER – PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**JUL 15 2014**

Mr. Paul Linehan, Vice President  
Nashua Circuits Incorporated  
29 Crown Street  
Nashua, NH 03060

Re: **NOTICE OF VIOLATION** of the applicable Generators Standards of Hazardous Waste, Section 3002 of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6622(a) and 6924(d) through (m) and the State of New Hampshire Revised Statutes Annotated (RSA), Chapter 147-A, and its implementing regulations, Env-Wm Parts 100 - 1100 (Env-Wm).

Dear Mr. Linehan:

On May 7, 2014, representatives of the United States Environmental Protection Agency (EPA) conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Nashua Circuits Inc., EPA ID No. NHD101403509 with the State of New Hampshire Revised Statutes Annotated (RSA) Chapter 147-A, and its implementing regulations, Env-Wm Parts 100-1100 (Env-Wm) and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The state of New Hampshire has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of the State of New Hampshire RSA and its implementing regulations, Env-Wm Parts 100-1100. The specific violations are set forth below:

1. **Failure to clearly label or mark the container first used to store wastes with the words "hazardous waste" and words that identify the contents of the container(s), as required by Env-Hm 509.03.**

Specifically, the following satellite container was not clearly labeled, as required by Env-Hm 507.03:

One 55-gallon SAA container, labeled, "Hazardous waste, AC7A cleaner solution, D002". The label was faded at the time of the inspection.

2. **Failure to maintain closed containers of hazardous waste, except to add or remove waste, as required by Env-Hm 507.01(3).**

Specifically, the following satellite container was open, when no waste was being added or removed:

One 55-gallon SAA container, labeled, "Hazardous waste, AC7A cleaner solution, D002". The label was faded. The container was closed at the time of the inspection.

3. **Failure to move the hazardous waste from the satellite accumulation area when the amount of hazardous waste reached 55-gallons to a designated hazardous waste storage area within 3 days of reaching the accumulation limit, as required by Env-Hm 509.03(i)(2).**

Specifically, there were two 55-gallon SAA containers labeled, "Hazardous waste, Clear IV shadow, D002", with a total of 70-gallons, located in the satellite accumulation area.

4. **Failure to update the Contingency Plan to include the current name of the emergency coordinator, as required by Env-Hm 509.02(a)(5).**

The plan must list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see §265.55), and this list must be kept up to date.

At the time of the inspection, Nashua Circuit's Integrated Emergency Contingency Plan, dated February 2011, included Edward Cabrera as the Emergency Coordinator, even though Mr. Cabrera no longer worked at the facility. At the time of the inspection, Frank Getek was the Emergency Coordinator.

5. **Failure to label or mark each universal waste batteries or containers holding batteries with any or all of the following: "Universal Waste - Battery(ies)", "Waste Battery(ies)", "Used Battery(ies)", as required by Env-Wm 1109.04.**

Specifically, fourteen universal waste lead acid batteries, located in the Universal Waste Storage Area, were not labeled with any or all of the following: "Universal Waste - Battery(ies)", "Waste Battery(ies)", "Used Battery(ies)".

6. **Failure to label or mark each universal waste cathode ray tube or containers holding intact, shredded, or broken universal waste cathode ray tubes with**

**any or all of the following: "Universal Waste - Cathode Ray Tube(s)", "Waste Cathode Ray Tube(s)", "Used Cathode Ray Tube(s)", as required by Env-Wm 1113.04.**

Specifically, three universal waste cathode ray tubes, located in the Universal Waste Storage Area, were not labeled with any or all of the following: "Universal Waste - Cathode Ray Tube(s)", "Waste Cathode Ray Tube(s)", "Used Cathode Ray Tube(s)", in accordance with Env-Wm 1113.04.

7. **Failure to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste, as required by Env-Hm 1102.04.**

Specifically, the facility did not demonstrate the length of time that the following universal waste had been accumulated from the date it becomes a waste, in accordance with Env-Hm 1102.04:

Three cathode ray tubes, located in the Universal Waste Storage Area, were not labeled and not dated.

Fourteen lead acid batteries, located in the Universal Waste Storage Area, were not labeled and were not dated.

You are hereby required to:

Immediately upon receipt of this **NOTICE**:

1. Clearly label or mark the container first used to store wastes with the words "hazardous waste"; and words that identify the contents of the container(s), as required by Env-Hm 509.03.
2. Maintain closed containers of hazardous waste, except to add or remove waste, as required by Env-Hm 507.01(3).
3. Move hazardous waste from the satellite accumulation area when the amount of hazardous waste reaches 55-gallons to a designated hazardous waste storage area within 3 days of reaching the accumulation limit, as required by Env-Hm 509.03(i)(2).
4. Update the Contingency Plan to include the current name of the emergency coordinator, as required by Env-Hm 509.02(a)(5).
5. Label or mark each universal waste batteries or containers holding batteries with any or all of the following: "Universal Waste - Battery(ies)", "Waste Battery(ies)", "Used Battery(ies)", as required by Env-Wm 1109.04.
6. Label or mark each universal waste cathode ray tube or containers holding intact, shredded, or broken universal waste cathode ray tubes with any or all of the

following: "Universal Waste - Cathode Ray Tube(s)", "Waste Cathode Ray Tube(s)", "Used Cathode Ray Tube(s)", as required by Env-Wm 1113.04.

7. Demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste, as required by Env-Hm 1102.04.

Within (30) thirty calendar days of receipt of this **NOTICE**:

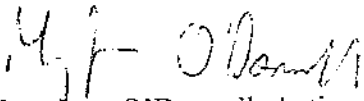
- a. Submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violation to:

Linda Brolin, Environmental Engineer  
U.S. Environmental Protection Agency  
5 Post Office Square, Suite 1000 (OES05-1)  
Boston, MA 02109-3912

Failure to correct the violation as required by this **NOTICE** may subject the facility to further federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA 42, U.S.C. § 6928.

If you have any questions regarding this **NOTICE**, please contact Linda Brolin, at (617) 918-1876.

Sincerely,



Mary Jane O'Donnell, Acting Chief  
RCRA, EPCRA, and Federal Programs Unit

cc: John Duclos, NH DES